

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

FELIX HERRERA GARCIA,
GREI MENDEZ, and
RENNY ANTONIO PARRA PAREDES,
a/k/a "El Gallo,"

Defendants.

**SUPERSEDING
INDICTMENT**

S1 23 Cr. 504 (JSR)

COUNT ONE

(Conspiracy to Distribute Narcotics Resulting in Death and Serious Bodily Injury)

The Grand Jury Charges:

1. From at least in or about October 2022 through at least in or about September 2023, in the Southern District of New York and elsewhere, FELIX HERRERA GARCIA, GREI MENDEZ, and RENNY ANTONIO PARRA PAREDES, a/k/a "El Gallo," the defendants, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that FELIX HERRERA GARCIA, GREI MENDEZ, and RENNY ANTONIO PARRA PAREDES, a/k/a "El Gallo," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances involved in the offense were: 100 grams and more of mixtures and substances containing a detectable amount of para-fluorofentanyl, an analog of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A); 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title

21, United States Code, Section 841(b)(1)(A); and one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

4. The use of such controlled substances resulted in the death of one individual (“Minor Victim-1”) and serious bodily injury to another individual (“Minor Victim-2”) on or about September 15, 2023, in the Bronx, New York.

(Title 21, United States Code, Section 846.)

COUNT TWO

(Possession with Intent to Distribute Narcotics Resulting in Death)

The Grand Jury further charges:

5. In or about September 2023, in the Southern District of New York and elsewhere, FELIX HERRERA GARCIA, GREI MENDEZ, and RENNY ANTONIO PARRA PAREDES, a/k/a “El Gallo,” the defendants, knowingly and intentionally distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and aided and abetted the same.

6. The controlled substances involved in the offense were: 100 grams and more of mixtures and substances containing a detectable amount of para-fluorofentanyl, an analog of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A); 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A); and one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

7. The use of such controlled substances resulted in the death of Minor Victim-1 on or about September 15, 2023, in the Bronx, New York.

(Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(A);
Title 18, United States Code, Section 2.)

COUNT THREE

(Possession with Intent to Distribute Narcotics Resulting in Serious Bodily Injury)

The Grand Jury further charges:

8. In or about September 2023, in the Southern District of New York and elsewhere, FELIX HERRERA GARCIA, GREI MENDEZ, and RENNY ANTONIO PARRA PAREDES, a/k/a "El Gallo," the defendants, knowingly and intentionally distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and aided and abetted the same.

9. The controlled substances involved in the offense were: 100 grams and more of mixtures and substances containing a detectable amount of para-fluorofentanyl, an analog of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A); 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A); and one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

10. The use of such controlled substances resulted in serious bodily injury to Minor Victim-2 on or about September 15, 2023, in the Bronx, New York.

(Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(A);
Title 18, United States Code, Section 2.)

FORFEITURE ALLEGATION

11. As a result of committing the offenses alleged in Counts One, Two, and Three of this Indictment, FELIX HERRERA GARCIA, GREI MENDEZ, and RENNY ANTONIO PARRA PAREDES, a/k/a "El Gallo," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

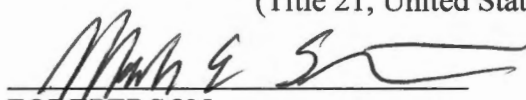
Substitute Assets Provision


12. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney